



# **MODERN SLAVERY STATEMENT 2023**

A handwritten signature in white ink, appearing to read 'Paul'.

This statement is approved by the DK Executive Board  
**Paul Kelly, CEO, July 2024**



**This Modern Slavery Statement is published in accordance with the Modern Slavery Act 2015 and sets out the steps taken by DK during the year ending 31st December 2023 to prevent modern slavery in our business operations and supply chain. It is our eighth statement and includes information about:**

- Our supply chain policies and contractual controls which define and communicate our commitment to ethical, responsible sourcing.
- Our activities during 2023 which uphold these policies and demonstrate our resolve to continually evolve our supply chain monitoring practices.
- Our collaborative approach to tackling modern slavery issues, working in partnership with our sister company, industry bodies including Book Chain Project, Ethical Supply Chain program and the Forest Stewardship Council® (FSC).

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# INTRODUCTION

**Modern slavery is an umbrella term used to cover a number of exploitative human rights offences including forced or compulsory labour, child labour, domestic servitude, human trafficking and workplace abuse. It is a serious global issue affecting all sectors and regions.**

**DK has a zero tolerance approach to modern slavery in all forms and continues to be committed to respecting, protecting and upholding the rights of workers, to ensure fair labour within our business and our supply chains, and to acting with integrity in all business dealings.**

This commitment is cemented in our company policies and processes and our resolve to regularly review our business practices to ensure that we can effectively prevent and remediate any negative impacts.

During 2023, we continued to prioritise actions which promote ethical business practices, further increasing transparency of our extended supply chain, as well as monitoring and improving the efficacy of our policies, working closely with our global suppliers and collaborating with industry partners.



# OUR BUSINESS

## DK Children's

Books for children 0-9+

## DK Licensing

Books created with partner brands

## DK Learning

Curriculum aligned books for educators and homeschoolers

## DK Living

Focused on adult audiences, with 3 areas of focus:

**Knowledge** – our reference publishing

**Travel** – our travel series and inspiration publishing

**Life** – our lifestyle focused list including our #1 gardening list

## DK RED

Our home for authored lifestyle and narrative non-fiction publishing

## In 2023 we had –

**35.1** million books printed

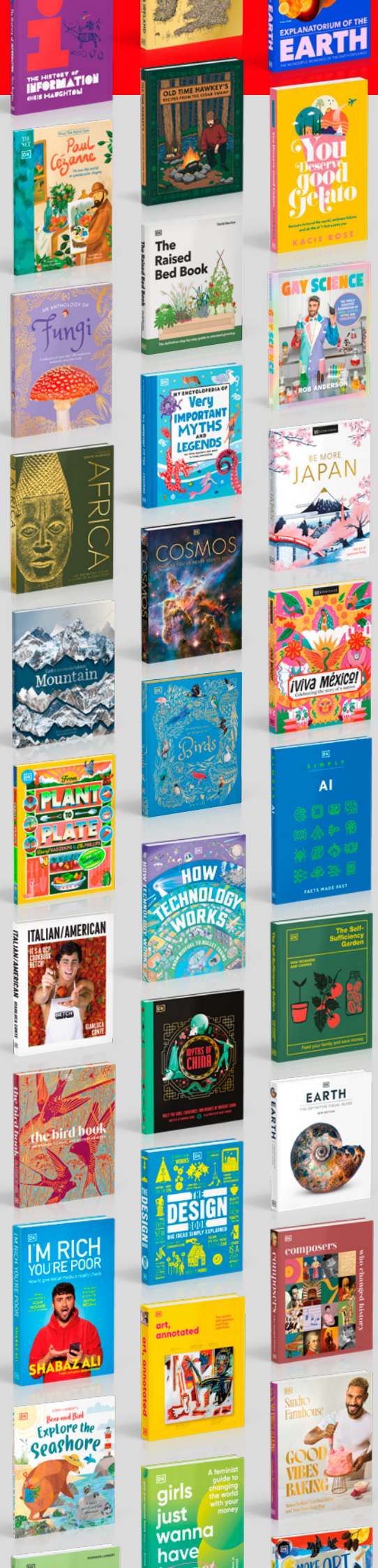
**3,091+** book titles

**762+** colleagues worldwide, across 7 global locations

**43** languages that we published in

**50** years of publishing experience

Offices in London, New York, Indianapolis,  
Delhi, Munich, Madrid, Beijing, and Jiangmen



# OUR SUPPLY CHAIN

**DK is a content publishing organisation procuring services globally from a wide variety of providers.**

DK's direct workforce primarily consists of highly skilled employees based mainly in office facilities. Our books, audio and digital content are designed in house, then manufactured by third party vendors prior to transportation, storage and distribution.

We are actively committed to ensuring that our products are responsibly and ethically sourced without infringement to human rights or local laws. Our long established ethical supply chain protocol provides us with a clear framework for taking iterative steps to ensure the protection of these rights and laws.

The Production team manages the DK supply chain. The Head of Operational Compliance and Sustainability, and the Purchasing Manager, work closely with this team to ensure that ethical compliance is incorporated into our procurement strategy with equal weight to commercial criteria.

Our global product supply chain is complex. We work closely with our suppliers and business partners, and seek to build sustainable long term relationships with them. We map our suppliers using a 'tier' system to help us identify and understand the flow of materials and manufacturing stages that go into producing our products. This system helps us to establish transparency of our supply chain, and is fundamental to ensure we can effectively focus our monitoring and mitigation activities.

Supply Chain Tier	Responsible for	Mapping status
One	Finished book products such as conventional and novelty books. Incorporates all locations where products are printed, bound or otherwise assembled.	Fully mapped.
Two	Outsourcers and subcontractors to the Tier One vendor; completing additional processes that can't be completed by the Tier One vendor. This may include applying cover finishes , or assembling components used in finished products such as CDs & sound chips.	Fully mapped.
Three	Components utilised by the Tier One or Tier Two vendors that will be used to make finished products. Will include locations processing raw materials to produce components such as paper or textile mills, ink & varnish manufacturers.	Partially mapped; We have now mapped all paper and paperboard mills, and core printers ink and adhesives.
Four	Raw Materials; incorporates sites where the raw materials used for components are grown or created such as forests and plantations, man-made fibres or substances etc.	Partially mapped; We are making progress and have mapped all pulp and forest sources of our paper and paper boards.



# SUPPLY CHAIN STATISTICS

**65 Tier One** operational supplier groups (i.e. manufacturers, freight, reprographic services, etc.) of which 50 were manufacturing suppliers operating over 53 plant locations

**15 countries** where our Tier One print manufacturing suppliers operate

**46 countries** that goods were delivered to

Our **top 10 suppliers** represent **87%** of our total spend and **89%** of our total volume





# OUR POLICIES

**The principles of sustained fair labour are embedded within our organisation and that of our parent company, Bertelsmann.**

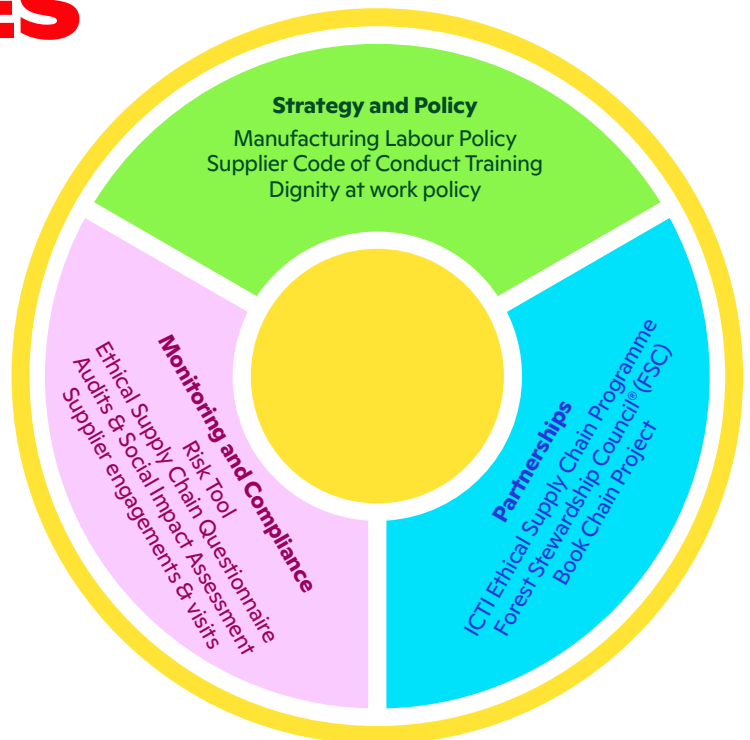
We believe all workers have a right to fair working conditions and a safe environment as set out in the International Labour Organisation (ILO) conventions, the Universal Declaration of Human Rights and the UN Global Compact (of which Bertelsmann is a signatory).

Our supply chain policies and contractual controls define and communicate our commitment to ethical, responsible sourcing. These include:

- **Supplier Code of Conduct**
- **Supplier Compliance Policy**
- **Manufacturing Subcontracting and Outsourcing Guidelines**

All business partners are required to implement and comply with our Supplier Code of Conduct. The code sets out mandatory minimum requirements for our partners in their business relationship with DK, and includes stipulations regarding the prevention of modern slavery.

Our Supplier Compliance Policy sets out our commitment to ensure that all our products are made without infringement of human rights or local laws, and to ensure good working practices are embedded throughout our supply chain. It provides a framework by which suppliers can demonstrate their commitment to the principles of fair labour



and it also ensures that we are monitoring suppliers against a set criteria, both in advance of them being selected as a supplier and regularly thereafter. All suppliers are asked to sign this document and are required to comply with this policy. Our due diligence process ensures that we regularly monitor adherence to the policy (see Audits and Internal Assessments). Key social compliance points of this policy include:

- **Suppliers in higher risk locations must participate in an ethical audit every 12 months**
- **Suppliers in lower risk locations must participate in an ethical audit every 24 months**
- **All suppliers must hold FSC Chain of Custody certification**
- **All suppliers are asked to hold ISO 9001 certification**





In addition, we ask manufacturing suppliers to sign a Manufacturing Agreement which includes specific obligations for suppliers to comply with the Modern Slavery Act.

We recognise that procurement behaviours can have a direct impact on a supplier's ability to meet and maintain ethical standards for labour and working conditions. Poor buying practices can contribute to modern slavery risks. We actively work with our suppliers to continuously improve our purchasing practices, with a view to limiting any negative human rights impacts resulting from how we buy our products. This includes transparency, cooperation and forward planning with our suppliers.

DK places high regard on the ethical and legally compliant conduct of the company and its employees, with each other and with our business partners. Our Equal Opportunities and Dignity at Work policy demonstrates our commitment to providing equitable opportunities and to avoiding discrimination. At DK, we strive for equal opportunity for everyone; we treat people how they wish to be treated; we make an effort to understand other perspectives and don't take our own as a given; we want to create a workplace culture where everyone feels valued and is only evaluated on skills and contribution; and we believe that people are at their best when they can be their authentic selves at work.

Within our directly managed operations, our Code of Conduct underscores our commitment to full compliance with all relevant laws and regulations, outlining binding minimum standards for responsible behaviour toward business partners and the public, as well as for our behaviour within the company. We have an established, confidential 'speak-up' system for raising concerns and reporting suspected misconduct without fear of retaliation. Everyone at DK is obligated to adhere to the principles laid out in this Code.

Our Facilities team has established a risk assessment process that is incorporated into vendor selection for all new and renewed facilities managed contracts; these include the companies and workers that clean our buildings and that offer waste management services. Through this process a scoring matrix has been created that assesses risk, and higher risk suppliers' compliance documentation is reviewed. Each year we conduct a scoring matrix of our current facilities suppliers, as well as offering continued support and training to assist them in moderating modern slavery issues effectively.

Our recruitment processes include identity checks on applicants which verify their right to work and are based on the employer pays principle. DK is a Living Wage Employer. DK has a union agreement covering the business and recognizes both NUJ and Unite unions.





# DUE DILIGENCE

## Risk monitoring

Within our product supply chain, we monitor and assess supplier risk using internationally recognised risk indices to help us identify and focus our priority activities.

Our risk assessment is aligned with publishing industry standards, and we utilise the Book Chain Project (BCP) Labour and Environmental Risk Tool, which has been developed for use by participants in BCP to support the assessment and segmentation of suppliers within the publishing supply chain. The tool assesses country level and supplier level risks for environmental, labour rights and health and safety. Additionally, we consider:

- **Implementation of worker rights at factory level**
- **Location of a supplier or factory**
- **Probability of migrant labour in the workforce**
- **Supplier spend**
- **Product type (printing, binding, components, paper, technology, etc.)**
- **Overall visibility of supplier's sourcing methods**
- **Supplier's environmental and sustainability standards**

Suppliers assessed as a higher risk priority using this criteria are required to participate in a more stringent due diligence programme, which includes undertaking an annual ethical audit. During 2023, 75% of our Tier One supplier plants were considered higher risk priorities and were subjected to additional due diligence monitoring.

We monitor global socio-cultural developments and ensure that our assessments appropriately reflect new risks as they arise.

## Audits and internal assessments

Higher risk priority suppliers must annually disclose a full audit report for review and maintain transparency and integrity throughout this process. Our preference is for Ethical Supply Chain Program audits (see Partnerships for further details), but we will also recognise and accept audits from the SEDEX and BSCI frameworks for new suppliers during the on-boarding process.

When reviewing an ethical audit, we perform an internal Fair Labour Assessment (FLA) which categorises any non-compliances by severity, informing our own responsive action plan. We expect suppliers to resolve non-compliances within a timeframe agreed with the audit body by providing and following a corrective action plan. Suppliers are expected to show continuous improvement.

Where a supplier is unable to fully implement a corrective action plan on major non-compliances within the allotted time frame, we will cease our relationship with that supplier.



We perform FLAs on 100% of all prospective manufacturing suppliers, and then perform them annually for incumbent priority suppliers. In 2023, we performed a total of 52 unique FLAs, meeting our target.

To understand how effective our policy and approach is in combating modern slavery and human trafficking within our supply chain, we continue to monitor the number of non-compliances, or observations that imply or demonstrate potential for modern slavery and take action accordingly.

### **Beyond audit**

We recognise that auditing is an important part of human rights due diligence but, in isolation, is ineffective at reducing risks to workers or motivating suppliers to improve. We actively support a number of beyond audit activities, that help build capacity, promote accountability and support better conditions.

Case Study : The Ethical Supply Chain Program (ESCP, formerly the ICTI Ethical Toy Program - see partnerships for further details), adopted the United Nations Women's Empowerment Principles in June 2022 as part of their commitment to promote gender equality and women empowerment in the workplace, marketplace and community. They launched a Gender Equality pilot programme for suppliers at the end of 2022 which ran through 2023. The programme worked directly with factories to educate and promote equality in the workplace, empower

female workers and help companies achieve the United Nations Sustainable Development Goal no.5: Achieve gender equality and empower women and girls. Three of our manufacturing suppliers (representing 42% of our manufacturing spend) took part in this pilot. The pilot programme delivered a mixture of in person and online training achieving an average 43% improvement in average gender equality scores moving factories from 'beginning' to 'very good' according to the ESCP ranking methodology.

### **Supplier site visits**

As part of our ongoing supply chain monitoring, we endeavour, where possible, to perform site visits of the manufacturing plant. Site visits form a key part of our assessment, which, in addition to audit reports and finance checks, allows us to develop a more in depth assessment of the supplier's management systems and the culture of the organisation. We are committed to continually 'spot checking' existing suppliers through site visits. We aim to visit a minimum of 30% of suppliers in higher risk locations at least annually. During 2023, we undertook 10 site visits, of which 7 were at suppliers in higher risk locations.



# OUR GOVERNANCE STRUCTURE

**DK has adopted a governance approach to modern slavery, appointing a named individual, the Head of Operational Compliance and Sustainability (HoOCS), to oversee ongoing compliance with the UK Modern Slavery Act 2015. This role reports directly into the Chief Operating Officer (COO) and is part of the global operational leadership team.**

Our HoOCS is responsible for setting and implementing policy to mitigate risks of modern slavery within our supply chain. DK has integrated our Supplier Compliance Policy and our Supplier Code of Conduct with our commercial purchasing strategy, to ensure we check and approve all suppliers prior to placing work with them. Our operational leadership team (which includes our COO, the HoOCS, and the Purchasing and Production Management teams) ensures that this commercial strategy incorporates the clear expectation of ongoing compliance and is discussed during our regular service levels reviews with suppliers. We use a central operational database to ensure that work cannot be placed with suppliers who have not been approved, and to monitor ongoing compliance.

Our Purchasing Manager is responsible for setting and implementing our commercial purchasing strategy and for managing ongoing relationships with those suppliers. Our Production and Procurement teams meet regularly to ensure that ethical criteria are addressed as soon as possible as part of establishing a new supplier relationship. We believe this creates a culture where upholding ethical principles is seen as central to our relationship with our suppliers. The Production team is responsible for the day-to-day implementation of policies and procedures related to procurement activities.

DK has appointed a corporate Integrity and Compliance Officer who has responsibility for overseeing business compliance, risk assessments and implementation of relevant corporate guidelines. Our corporate guidelines on anti-corruption and integrity include specific reference to requirements when commissioning third parties and the importance of the Penguin Random House Supplier Code of Conduct.



# PARTNERSHIPS

## Ethical Supply Chain Program

**DK has recognised the Ethical Supply Chain Program (ESCP, previously known as the ICTI Ethical Toy Program: [www.ethicalsupplychain.org](http://www.ethicalsupplychain.org)) since 2008, and has been a full buyer member since 2017.**

ESCP provides us with a range of tools and resources that help us to manage ethical risks at the factories we source from. Importantly, membership provides us with improved access to and transparency of real time audit findings, allowing us to act quickly should non-compliances be identified. ESCP certification includes detailed criteria for manufacturers to ensure that no forced, child, involuntary or prison labour is used, no recruitment fees are charged, and all overtime is voluntary. It provides capability building and training programs, factory education, peer-to-peer learning, worker wellbeing programmes and a worker helpline which supports workers and drives continual improvements at the factory level. In addition, membership provides us access to ESCP's expert special investigation team, working on-the-ground to solve problems and engaging factory management.

The ESCP Worker Helpline, established in 2010, fosters positive and productive exchanges between factory management and workers. The purpose of the Helpline is to inform, educate and empower workers so they can effectively manage work-related issues; also acting as a confidential grievance mechanism when required. The Helpline bridges communication between factory workers and management and provides an effective labour dispute mechanism for workers within the ESCP program. During 2023, the Helpline supported 53 workers from 15 different supplier's with whom we work on a number of issues including factory rules & policies, working hours and resignation support).



## Book Chain Project

**The Book Chain Project (BCP) is a collaboration of leading publishers that have been working together to drive social and environmental responsibility in members' product supply chains.**

BCP provides a publishing industry Code of Conduct, articulating standards of labour practice and environmental performance. It is based on internationally-recognised standards, codes and laws, including the ILO Conventions, the UN Declaration for Human Rights and the ETI Base Code, and is updated regularly. Recent updates provide further guidance and expectations on the topic of recruitment of migrant workers, with the key principle that employers should pay the cost of any recruitment fees.

BCP hosts regular workshops to collectively address and understand the systemic issues and root causes of the types of modern slavery that are higher risk within the publishing sector. As a founding participant of BCP, DK supports and recognises the BCP Supplier Code of Conduct, and actively participates in their beyond audit programmes.

## Forest Stewardship Council®

**DK has held the Forest Stewardship Council® (FSC) Chain of Custody certification since 2006.**

FSC promotes environmentally appropriate, socially beneficial, and economically viable management of the world's forests. It has an extensive due diligence process in place to ensure that slavery and human trafficking is not part of the production process, and a number of policies and standards which provide the basis of auditable requirements for achieving FSC certification. FSC's core labour requirements include the effective abolition of child labour, elimination of all forms of forced or compulsory labour, the elimination of discrimination in respect of employment and occupation, respect of freedom of association and the effective recognition of the right to collective bargaining. This is in addition to existing mandatory requirements relating to the protection of worker's rights established under the separate forest management certification process. Ensuring that we utilise FSC certified materials therefore provides an additional layer of due diligence within our supply chain. Since January 2021, 100% of the paper and board materials used in our products are FSC certified.



# TRAINING

**We encourage our suppliers to participate in training that supports awareness of socially responsible business practices.**

During 2023 The Book Chain Project ran a series of training sessions open to all of our suppliers. Topics included 'transparency in supply chains', 'human rights legislation', 'how to complete a human rights risk assessment' and 'grievance mechanisms'. Each seminar was attended by a number of our manufacturing suppliers.

All DK employees are required to participate in Code of Conduct training when joining the business as part of their induction. Our Code of Conduct sets out DK's commitment to the highest standards of integrity, ethics and social responsibility and helps colleagues understand our ethical stance and how it should be applied in our daily business activities. This training also provides information on our confidential whistleblowing policy. Employees are expected to report any concerns, including those related to human rights violations, to the Ethics and Compliance team who will investigate all allegations and take appropriate action. During 2023, 98.5% of

new starters to the business participated in our Code of Conduct training and 82.5% of colleagues undertook refresher training.

Compulsory Ethical Supply Chain training takes place as part of the induction process for all new colleagues working in our production teams. This training covers modern slavery risks and the steps that we take as part of our due diligence process to mitigate and eliminate such risk. During 2023, 100% of new starters to the production team participated in Ethical Supply Chain training. In addition, every year the updated Modern Slavery Statement is shared with every employee via our internal intranet.



# APPENDIX

Year	Activity
2016	Manufacturing Agreements updated to include specific clauses relating to the prevention and mitigation of Modern Slavery Risks.
	Risk Assessments updated to identify categories and services that have a higher risk of Modern Slavery
2017	Published DK's first annual Modern Slavery Statement in April
	Created and rolled out our Supplier Code of Conduct setting our mandatory minimum requirements and incorporating stipulations related to the prevention of Modern Slavery.
	Joined ICTI Ethical Toy Program (now ESCP) as brand members. The ESCP certification includes detailed criteria to ensure that no forced, child, involuntary or prison labour is used, no recruitment fees are charged, and all overtime is voluntary.
	Adopted Book Chain Project's country risk tool to support the assessment of geographic risk.
2018	Updated our internal Fair Labour Assessment metrics and our non-compliance handling processes.
	Introduced our Ethical Supply Chain questionnaire for suppliers in 'lower risk' regions (as defined by the Book Chain geographic risk tool).
	Group Legal Director appointed as the DK Integrity and Compliance officer with responsibility for overseeing corporate compliance, risk assessments and implementation of relevant corporate guidelines.
2019	The Facilities team initiated an updated annual process for modern slavery risk monitoring which includes data gathering and risk assessment and which has been incorporated into all new and renewed facilities managed contracts.
	DK refreshed its Equal Opportunities and Dignity at Work policy during January 2019, rolling this out to all staff in line management positions and providing training.
	New corporate compliance guidelines rolled out by the DK Integrity and Compliance officer
	Manufacturing outsourcing and subcontracting guidelines created and rolled out across our operational supply chain, providing greater transparency of our Tier 2 suppliers.
	Book Chain Project reviewed and updated the Forced Labour element of the Supplier Code of Conduct, providing further guidance and expectations on the topic of recruitment of migrant workers, with the key principle that employers should pay the cost of any recruitment fees.
2020	Supported Book Chain Project responsible recruitment activities, working with our Malaysian supplier base to implement recommendations.
	Manufacturing Labour Policy reviewed and audit acceptance criteria updated to specify that announced audits will no longer be acceptable.
2021	Manufacturing supplier agreement updated to strengthen clauses on subcontracting and outsourcing
	Updated our internal Fair Labour Assessment grading system to strengthen our response to issues associated with migrant labour recruitment.
	Adopted revised Bertelsmann Code of Conduct which introduces a user-friendly "Speak-up" system for the confidential reporting of compliance issues.
2022	New Supplier Compliance Policy created and rolled out.
	Participated in the ICTI Ethical Toy Program (now ESCP) Social Impact Assessment (now ESCP)
	Supported the ICTI (now ESCP) Gender Equality Pilot Programme nominating 3 manufacturing sites.
2023	3 suppliers completed the Ethical Supply Chain Program Gender Equality pilot programme.
	Book Chain Project reviewed the risk tool, updating the methodology to include 4 new internationally recognised indices, to further strengthen the efficacy of the tool.
	Book Chain Project launched a new risk tool for use by manufacturing suppliers. The tool allows suppliers to further assess the inherent labour and environment risks within their own supply chains.